

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF PENNSYLVANIA

3 CIVIL ACTION NO.

4 02-CV-3830

5 BOARHEAD FARM AGREEMENT Judge Legrome D. Davis
6 GROUP,

7 Plaintiff, Oral Deposition of:

8 vs. Arthur T. Curley, Jr.

9 ADVANCED ENVIRONMENTAL TECHNOLOGY
10 CORPORATION; ASHLAND CHEMICAL
11 COMPANY; BOARHEAD CORPORATION;
12 CARPENTER TECHNOLOGY CORPORATION;
13 CROWN METRO, INC.; DIAZ CHEMICAL
14 CORPORATION; EMHART INDUSTRIES,
15 INC.; ETCHED CIRCUITS, INC.; FCG,
16 INC.; GLOBE DISPOSAL COMPANY, INC.;
17 GLOBE-WASTECH, INC.; HANDY & HARMAN
18 TUBE COMPANY, INC.; KNOLL, INC.;
19 MERIT METAL PRODUCTS CORPORATION;
20 NOVARTIS CORPORATION; NRM INVESTMENT
21 COMPANY; PLYMOUTH TUBE COMPANY;
22 QUIKLINE DESIGN AND MANUFACTURING
23 COMPANY; RAHNS SPECIALTY METALS,
24 INC.; ROHM & HAAS COMPANY, SIMON
25 WRECKING COMPANY, INC.; TECHALLOY
 COMPANY, INC.; THOMAS & BETTS
 CORPORATION; UNISYS CORPORATION;
 UNITED STATES OF AMERICA
 DEPARTMENT OF NAVY,
 Defendants.

18 * * * * *

19 Thursday, December 9, 2004

20 * * * * *

21 Transcript in the above matter taken at
22 the offices of Ballard, Spahr Andrews & Ingersoll,
23 LLP, Plaza 1000, Main Street, Suite 500, Voorhees,
24 New Jersey, commencing at 10:00 a.m.

25 Certified Shorthand Reporting Services
 Arranged Through
 Mastroianni & Formaroli, Inc.
 709 White Horse Pike
 Audubon, New Jersey 08106
 (856) 546-1100

1 A. I don't know, I don't know.
2 Q. Would Mr. Cellari know that?
3 A. Possibly, yes.
4 Q. Do you know the names of any people who
5 actually performed the CDN manufacturing process, in
6 1976 and '77?

7 MR. BIEDRZYCKI: You mean like the
8 kettle operators?

9 THE WITNESS: Kettle operators?
10 BY MS. MOONEY:

11 Q. That's what I mean.
12 A. Off the top of my head, no.
13 Q. Other than the aqueous layer and the
14 spent acid, were there any other wastes generated
15 from the CDN manufacturing process?
16 A. I don't believe so, no.
17 Q. How about for the dyes, what wastes were
18 generated in the manufacture of dyes in 1976 and 1977
19 at Great Meadows?

20 A. Two basic waste streams from the dyes,
21 again you're talking about a myriad of processes,
22 some of the processes you would get a solvent, a
23 waste solvent, primarily isopropyl alcohol. And also
24 you'd get an aqueous layer.

25 Q. At what step in the dye manufacturing